

**AFFIDAVIT OF BRUCE P. MERENSTEIN
TENDERED PURSUANT TO FED. R. CIV. P. 53**

STATE OF PENNSYLVANIA)

) ss.

AFFIDAVIT

COUNTY OF PHILADELPHIA)

Bruce P. Merenstein, being duly sworn according to law, states the following:

I am an attorney at law, duly licensed to practice law in the Commonwealth of Pennsylvania.

I have thoroughly familiarized myself with the issues involved in the matter captioned *USA ex rel. International Brotherhood of Electrical Workers v. Fairfield Co.*, No. 5:09-cv-04230-LS (E.D. Pa.). As a result of my knowledge of that case, I can attest and affirm that there are no known grounds for disqualification under 28 U.S.C. § 455 that would prevent me from serving as the Special Discovery Master in the captioned matter.

FURTHER AFFIANT SAYETH NAUGHT.

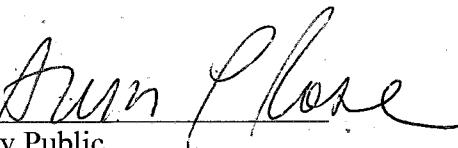


BRUCE P. MERENSTEIN

Sworn to before me and

Subscribed in my presence

this 4 day of November 2015.



Notary Public

